



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

01-0488

May 28, 2002

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: **Comments on General Electric Company's March 27, 2002 report titled "Building 71 and Hill 78 On-Plant Consolidation Areas 2002 Construction/Consolidation Activities, Pittsfield, Massachusetts."**

Dear Mr. Silfer:

The Environmental Protection Agency (EPA) has conditionally approved the detailed design components of the OPCA cells in our correspondences dated January 30, 2001 and March 9, 2001. Additionally, the EPA hereby approves General Electric's (GE) March 27, 2002 submittal related to the 2002 planned expansion of the Building 71 OPCA.

GE has requested in their March 27, 2002 letter to continue temporary storage of sediments and soils excavated from the Upper ½ Mile Reach of the Housatonic River in Buildings 33-north, 33-X, and 65. The EPA approves this request for temporary storage in accordance with the same substantive conditions as previously approved by EPA for storage of such materials in these buildings.

In addition, the EPA has the following comments on the 2002 OPCA consolidation activities as presented in the above referenced document for your consideration.

Comments:

1. Page 2-5, Section D: First bullet, 3rd paragraph: It is EPA's understanding that GE's intention is to transfer only 'dry' material to the OPCA. However, if it becomes necessary to place material in the OPCA (without stock piling), GE shall notify EPA prior to the initiation of such a transfer.

Third bullet: There are portions of slopes on Hill 78 OPCA, particularly on its north side, as shown on Sheet 4, that exceed the 3H:1V maximum. As part of the final grading and prior to cap placement these areas should be recontoured so that the 3H:1V slope is not exceeded.

2. Section 02200 Earthwork, Part 3.04C, 9 : Due to the potential physical variability of materials within a given borrow area, it is recommended that a frequency for laboratory

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testing of soil materials be specified in order to ensure that the material samples tested are representative of the actual material.

3. Section 02234 Flexible Membrane Liner: Part 3.01B.b: A statement prohibiting the operation of ALL equipment, except low-ground pressure ATVs used in deploying the materials, from operating directly on top of the geomembrane (geosynthetics) should be included.
4. Drawings: For the Hill 78 OPCA, there are no clearly defined toe perimeter storm water channels to control and convey flow to the "2002" storm water management basin. This is of particular concern on the southern and eastern sides of the OPCA, near the Contractor Materials and Equipment Storage Area. The permanent storm water controls, including mid-slope swales and perimeter ditches will be defined during the 'final' design of the OPCA.

As you know, it is GE's responsibility to ensure that the design, materials placement, materials securement, and final closure of the OPCAs comply with the performance standards contained in the Statement of Work as attached to the Consent Decree and with the OPCA Work Plans, as conditionally approved. This letter and EPA's approvals do not constitute a guarantee that GE will meet it's requirements regarding the OPCAs.

If you would like to discuss this letter, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

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